

ITEM NO. RA2

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
SPECIAL PUBLIC MEETING DATE: March 20, 2020

REGULAR CONSENT EFFECTIVE DATE _____ Upon Commission Approval _____

DATE: March 19, 2020

TO: Public Utility Commission

FROM: John Crider

THROUGH: Bryan Conway

SUBJECT: NORTHWEST NATURAL GAS:
(Docket No. ADV 1102)
Request a change to Sheet C-2, Schedule C to allow a temporary suspension of the Late Payment Charge.

STAFF RECOMMENDATION:

Staff recommends that the Commission approve Northwest Natural Gas's (Company) request for a tariff change in order to allow for temporary suspension of late charges for unpaid accounts with less than statutory notice.

DISCUSSION:

Issue

Whether the Commission should approve the Company's request to modify language in its tariff sheet in order to allow discretionary suspension of late charges for unpaid accounts.

Applicable Rule or Law

ORS 757.205, OAR 860-022-0025, and OAR 860-022-0030 establish rules for tariff changes and updates to rates. ORS 757.220 provides for less than 30 days' notice for a tariff change with good cause.

Analysis

The language in the Company's Schedule C – Miscellaneous Charges states in part: "A late payment charge *will* be applied to Customer accounts not paid in full each month by the payment due date" (emphasis added). The Company proposes to replace the word "will" with the word "may" in order to provide discretion in applying the charge. This flexibility will allow the Company to temporarily waive late charges for unpaid accounts during the declared COVID-19 emergency.

In its petition, the Company states that it considers the tariff revision to be practical in the face of changing economic conditions for its Oregon customers, and believes the flexibility to waive charges is in the best interest of its customers.

The Company filed the request to be approved with less than statutory notice as required by ORS 757.220. The Company claims "good cause" due to the request being in response to the declared COVID-19 emergency. Staff agrees with the Company's rationale for good cause.

Conclusion

Staff concludes that the Company's tariff modification request is warranted, is in the best interest of customers, and should be granted with less than statutory notice.

PROPOSED COMMISSION MOTION:

Approve Northwest Natural Gas's request for a modification to tariff Sheet C-2, Schedule C to allow for temporary suspension of late charges for unpaid accounts with less than statutory notice.